

William Patmon

From: William Patmon
Sent: Wednesday, October 19, 2011 10:56 AM
To: Kristopher Armstrong
Cc: Jewel Patmon
Subject: Supplemental production needed for depositions of Weiss and cotrell

1. Easterday testified that an "African or black" women was fired by the internal medicine program during the time period of 2006 to 2010. Please produce all personnel records for this person including her discipline file and reason for termination,
 2. Medical records of patient whom the alleged A-line procedure was performed on. Her patient records contemporaneously prepared by staff are needed to establish whether in fact the events occurred as stated by alleged witnesses.
 3. Jonathan Borders disciplinary history and personnel file including the reasons for his termination.
 4. The program education committees files and internal medicine files and records relied upon to terminate Dr. Nayyar.
 5. Notice provided to Mount Carmel staff ordering them to preserve records. Both Li Tang and Easterday testified they were never told to preserve records and their separations from Mount Carmel occurred well after the hospital was on notice of the litigation.
 6. Dr. Nayyars personnel file or equivalent file in which Weiss relied upon to identify "past and recent" events justified firing Nayyar.
 7. Records of any and all Indian residents and licensed physicians fired at mount Carmel west.
 8. Weiss and cotrell personnel, performance and disciplinary history.
 9. All hospital and corporate communications regarding the residents January 2009 petition.
 10. Copy all notices, statements or record of any kind wherein Nayyar and residents, as well as cotrell, were informed that they were not to communicate during the A-line investigation.
- Sent from my iPad

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